Attachment Q -
Fredericksburg District
Office Maintenance Yard

VDOT MS4 (General Permit No. VAR04)
Fredericksburg District Office and Residency Complex
VDOT District No. 6

Facility Name: Fredericksburg District Office and Residency Complex
Location: 87 Deacon Road, Fredericksburg, VA, 22405
Latitude: N 38.318166* **Longitude** W 77.447852*

Date of Visit: October 23, 2012
Entry Time: 8:45 a.m. (approx)
Exit Time: 12:30 p.m. (approx)

Site Owner and/or Operator: VDOT – Fredericksburg District

Site Contact: Marcie Parker (District Maintenance Engineer, VDOT)

Conducted by: Max Kuker (PO Environmental, LLC), Anthony D'Angelo (PO Environmental, LLC), Allison Graham (U.S. EPA Region 3), and Pete Gold (U.S. EPA Region 3)

Accompanied by[1]: Morris Walton (Roadside, VDOT), Tracey Harmon (Water Quality Permits Supervisor, VDOT), David Wilson (HAZMAT Compliance Manager, VDOT), Bart Van Nieuwenhuise (Infrastructure Manager, YDOT), V.G. "Mac" McQueen (Acting District Equipment Manager, VDOT), Paul Doherty (District Facility Manager, YDOT), Crystal "Nicky" Childs (District Fuel Coordinator, VDOT), Cathy Hairfield (District Fuel Coordinator, VDOT), Lee Hixon (Consultant, EEE Consulting, Inc.), and Chris Swanson (Consultant, EEE Consulting, Inc.)

Site Visit Report Prepared by: Anthony D'Angelo (PG Environmental, LLC)

On October 23,2012, the EPA Inspection Team conducted a site visit at the Fredericksburg District Office and Residency Complex (hereinafter, Facility). Dry weather conditions were experienced throughout the inspection activities. Weather history reports from the National Oceanic and Atmospheric Administration station Piedmont RSCH STN – 44-6712 indicated that on 010/18/2012, 0.9" of precipitation occurred and on 10/15/2012, 0.1"of precipitation occurred.

Based on a review and comparison of this site visit location and the United States Census 2000 Urbanized Area designation, it was determined that the Facility is located within the MS4 Compliance Area. The Facility comprises multiple buildings (e.g., office buildings, vehicle maintenance building, storage buildings), a vehicle fueling island, and vehicle/equipment storage areas. Various activities are conducted at the Facility, including the following: vehicle/equipment storage, repair, and fueling. Stormwater runoff from the Facility is conveyed to two discharge locations. Stormwater from a majority of the Facility where maintenance activities occur, is collected via a series of stormwater inlets in the interior of the Facility, and a culvert along the western fence line. Stormwater runoff collected in this portion of the Facility is conveyed to a single point of discharge along the western perimeter of the site, to the railroad right-of-way that runs along the western fence line of the Facility.

[1] Sign-in sheets for the site visit are provided after the photograph log.

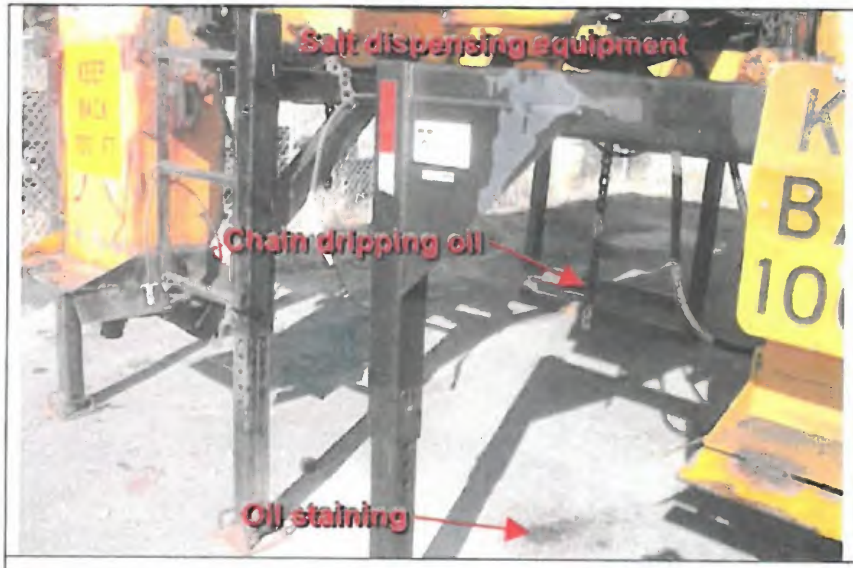
As explained by VDOT Facility staff, Claiborne Run flows parallel to the railroad tracks, west of the Facility and railroad right-of-way, and receives all stormwater runoff from the Facility. Stormwater from the remaining portion of the Facility (mostly VDOT and employee vehicle parking and a roadway), flows to the southern portion of the site near the guard shack and eventually discharges to Claiborne Run.

The EPA Inspection Team observed/obtained the following with regard to the Facility:

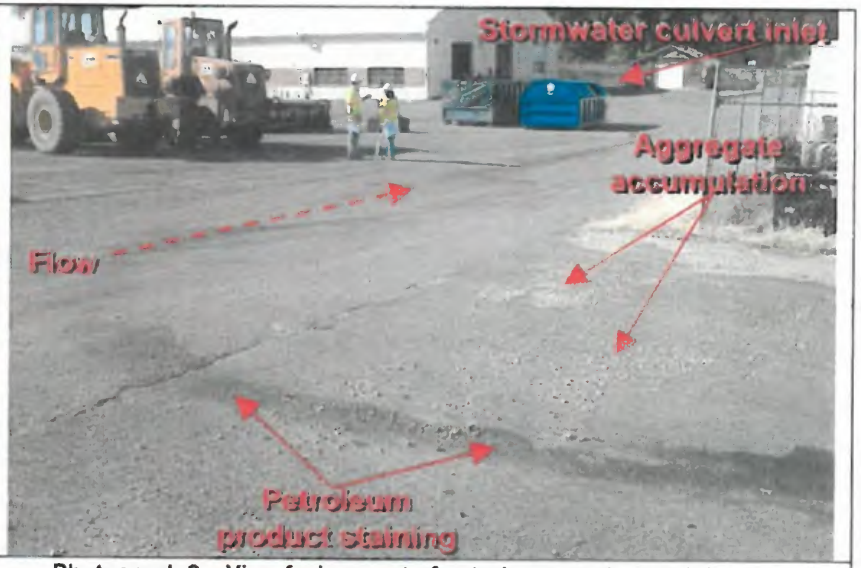
1. At the time of the inspection a formal plan for addressing stormwater pollution prevention and good housekeeping at the Facility had not been developed or implemented (e.g., Stormwater Pollution Prevention Plan).
2. The VDOT Facility District Maintenance Engineer explained that an annual district-wide housekeeping inspection was conducted at the Facility in June 2012. The EPA Inspection Team requested records for the housekeeping inspection and VDOT provided the records in the VDOT Response Inventory (see VDOT Response Inventory Item No. 44.B). In addition, each month the VDOT Staff completes a safety and fuel checklist for the Facility. The VDOT Facility District Maintenance Engineer added that formal documented pollution prevention inspections of the Facility are not conducted on a regular basis.
3. The VDOT District Maintenance Engineer explained that several weeks prior to the EPA inspection, MS4 training and an associated power point presentation was provided to Facility staff; however, written documentation of that training was not maintained. The EPA Inspection Team requested records for the MS4 training and VDOT provided the records in the VDOT Response Inventory (see VDOT Response Inventory Item No. 44C).
4. Hydraulic fluid was observed actively leaking onto an impervious surface from the hose of a salt spreader in the northeast portion of the Facility (see Photograph 1). The VDOT Facility personnel stated that equipment located in the northeast portion of the Facility was either scheduled for repair or waiting to be sold.
5. Multiple rust and petroleum stains, and accumulated aggregate were observed on the impervious surface in the northeast portion of the Facility (see Photographs 2 through 4). The impervious surface east of the maintenance buildings was sloped downgradient to the west (see Photograph 3).
6. Visible petroleum staining and aggregate accumulation was observed on the impervious surface located to the north of the vehicle maintenance building (see Photographs 5 through 7). The staining was observed upgradient of a storm water conveyance culvert, which conveys stormwater runoff to the primary discharge location at the central-west perimeter of the Facility (see Photograph 8).
7. Cigarette butt litter was observed inside a storm drain inlet located along the western fence line of the Facility at the employee break area (see Photographs 9 and 10). The storm drain inlet connected to a stormwater conveyance culvert which conveys stormwater runoff to the primary discharge location at the central-west perimeter of the Facility.
8. A 55-gallon drum of sump water was observed stored outside at the Facility fuel island without secondary containment implemented, or procedures to ensure the product was not spilled during the emptying of waste (see Photographs 11 and 12). The drum was located upgradient of the primary discharge location at the central-west perimeter of the Facility.
9. A portable diesel tank was observed stored outside on the south side of the construction office buildings in the southwest portion of the Facility, without containment or overhead coverage best management practices (BMPs) (see Photograph 13). It was unclear to the inspection team if the tank contained diesel product; however, fluid was present inside the diesel tank.

10. VDOT Facility staff did not have procedures for bulk fuel unloading, fuel vendors, or routine fueling of vehicles/equipment. The fuel island is located immediately upgradient of the western stormwater discharge location (see Photograph 14).
11. Trash and vegetative debris was observed at the Facility discharge location on the east side of the adjacent railroad tracks which run along the western perimeter of the Facility (see Photographs 15 and 16). The VDOT Facility District Maintenance Engineer stated that she had not observed cleaning operations at the Facility discharge location since her initial start date at the Facility (approximately 2 years).
12. Numerous water spigots were located throughout the Facility. Specifically, a connected water faucet was observed on the north side of the construction office building (see Photograph 17), a connected hose bib was observed on the north side of the fueling island shack (see Photograph 18), and a connected water faucet was observed at the facilities building north of the vehicle repair storage area on the northern side of the Facility. No BMPs had been implemented to prevent washing activities from resulting in an illicit discharge.
13. The oil-water separator located on the west side of the Facility and north of the fuel island was nearing capacity (see Photograph 19). The EPA Inspection Team confirmed that the oil-water separator was connected to the sanitary sewer system. Facility staff stated that there was no regular maintenance on the OWS; however, a maintenance program was being set up.
14. Floor trench drains, a shop sink and a vehicle washing station were observed to be located inside the vehicle maintenance building. VDOT staff stated that the drainage for those sinks and drains are connected to an oil-water separator which discharges to the sanitary sewer. However, per discussions with the VDOT Facility staff, it was explained that washing operations no longer occur at the Facility. The Inspection Team observed a connected hose and water with an oily sheen inside the floor drains in the washing area. VDOT Facility staff explained that there were not set procedures or a set inspection frequency for the on-site oil-water separator.
15. White staining adjacent to the outfalls was observed at the facility; however, facility staff stated that painting operations were not performed at this facility.
16. A floor drain was observed in the welding area with heavy equipment parked on top of it. According to VDOT facility staff, all of the floor drains in the shop were connected to OWS.
17. Asphalt was observed to be inside one storm drain inlet.

Site Photographs	VDOT MS4 (General Permit No. VAR04) Fredericksburg District Office and Residency Complex VDOT District No. 6	Photograph Date: 10/23/2012



Photograph 1 – View facing north of salt dispensing equipment actively leaking a petroleum product onto the impervious surface below.



Photograph 2 – View facing west of petroleum product staining and aggregate accumulation on the impervious surface in the northeast corner of the Facility.

Photograph 3 – View facing west of rust and petroleum product staining on the impervious surface in the northeast portion of the Facility.

Photograph 4 – View facing southwest of petroleum product staining on the impervious surface in the northeast portion of the Facility.

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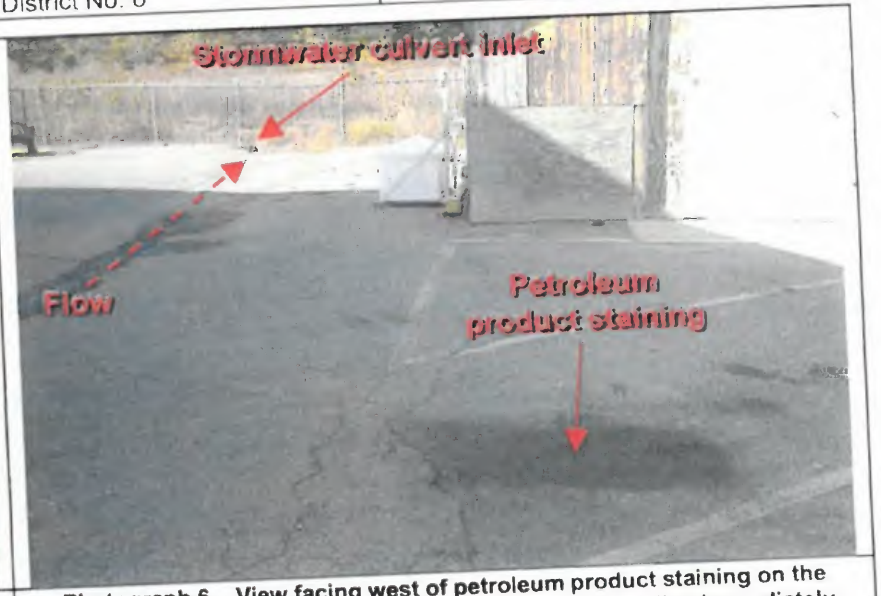
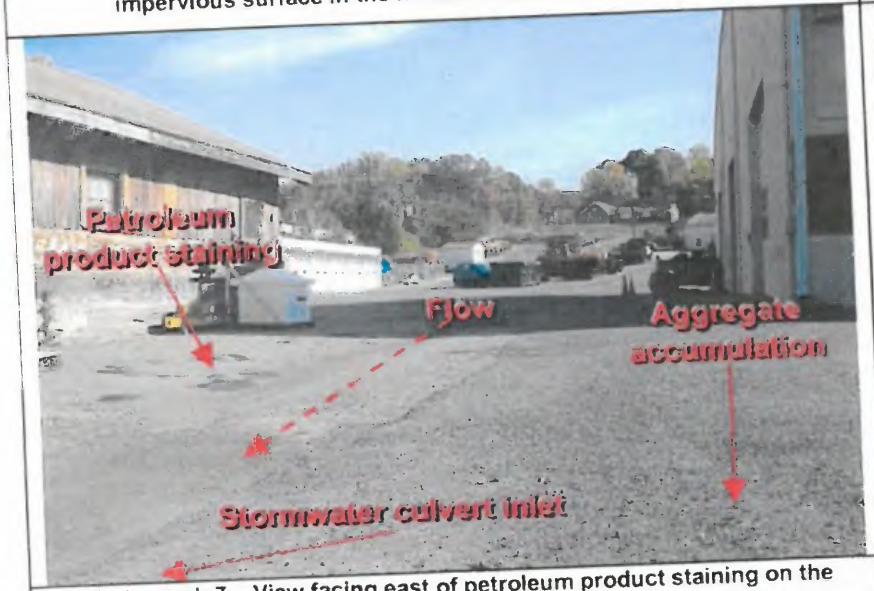
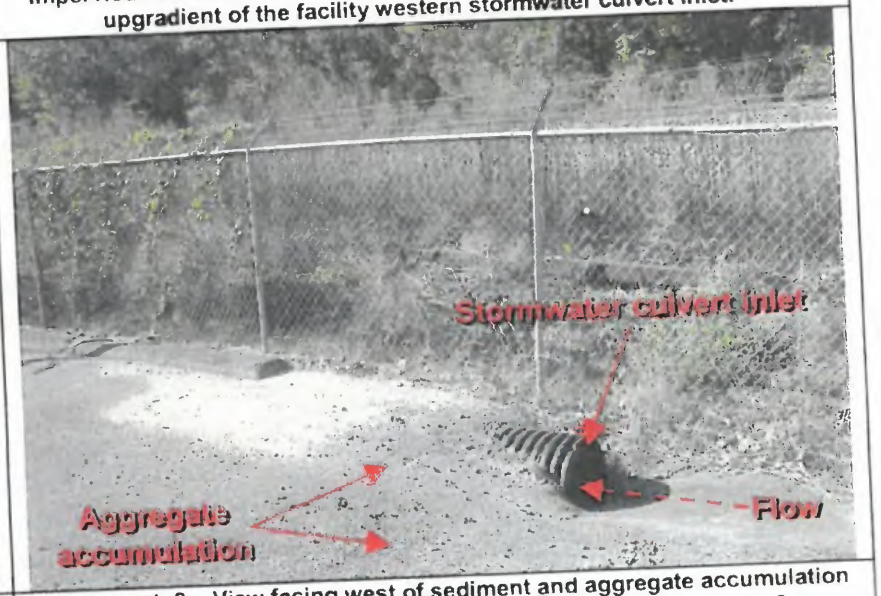
Photograph 5 – View facing north of petroleum product staining on the impervious surface in the northwest portion of the Facility.



Photograph 6 – View facing west of petroleum product staining on the impervious surface in the northwest portion of the Facility, immediately upgradient of the facility western stormwater culvert inlet.



Photograph 7 – View facing east of petroleum product staining on the impervious surface in the northwest portion of the Facility.



Photograph 8 – View facing west of sediment and aggregate accumulation immediately adjacent to the stormwater culvert inlet in Photo 6.

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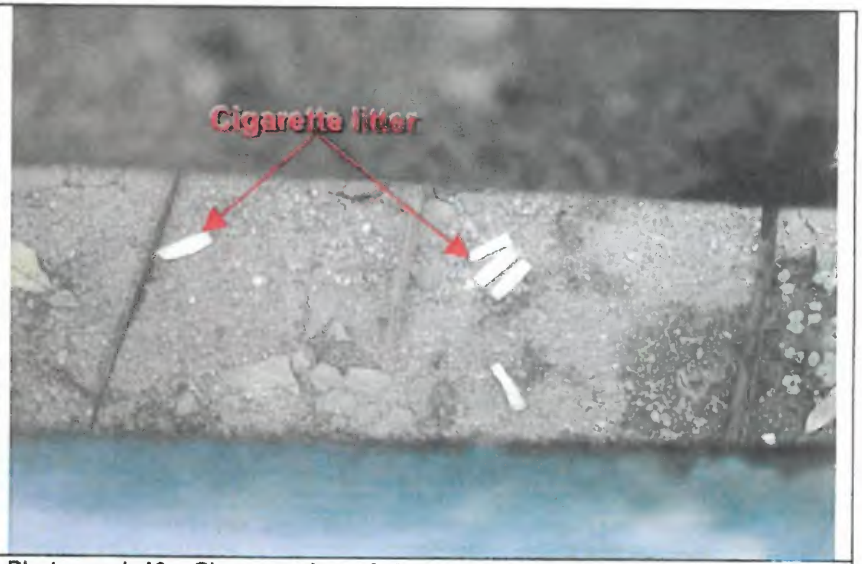
Photograph 9 – View facing west of a storm drain inlet located in the employee break area.



Photograph 10 – Close-up view of cigarette butt litter in the storm drain inlet shown in Photo 9.

Photograph 11 – View facing west of a 55-gallon drum of sump water located upgradient of a Facility stormwater discharge location. Note the drum of sump water was not in secondary containment.

Photograph 12 – View facing north of a 55-gallon drum of sump water located upgradient of a Facility stormwater discharge location. Note the drum of sump water was not in secondary containment.

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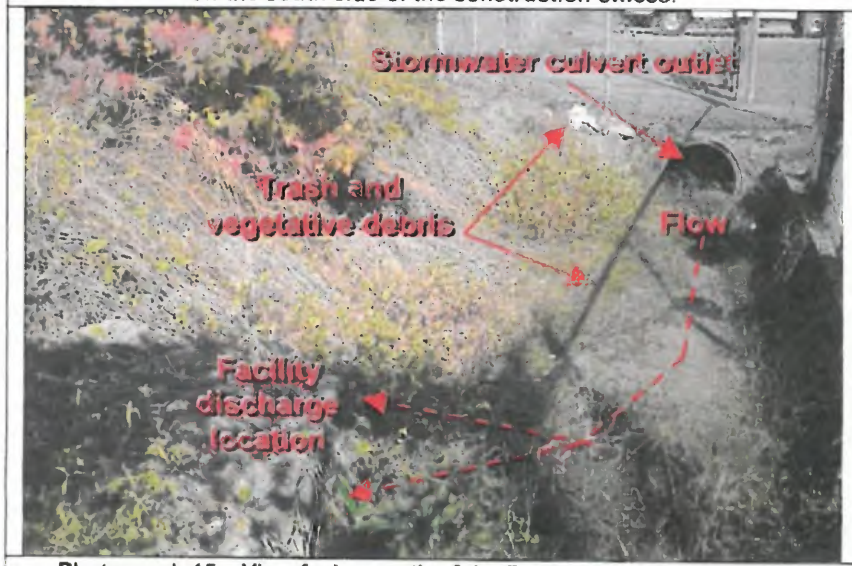
Photograph 13 – View facing northwest of a used diesel tank stored outside on the south side of the construction offices.

Photograph 14 – View facing east of the Facility fuel island located immediately upgradient of a Facility stormwater discharge location.



Photograph 15 – View facing north of the Facility western stormwater discharge location.

Photograph 16 – View facing northwest of the Facility western stormwater discharge location.

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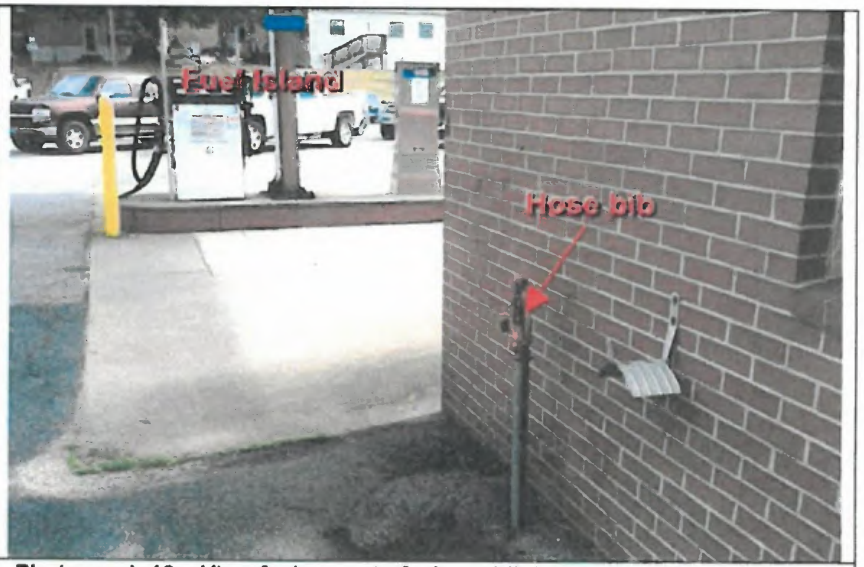
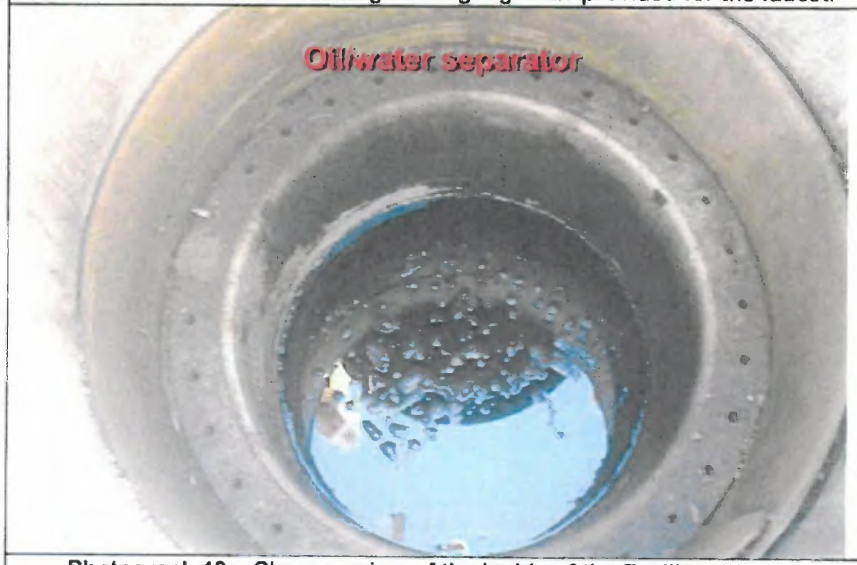
Photograph 17 – Close of view of a water faucet located on the north side of the construction office building. No signage was provided for the faucet.



Photograph 18 – View facing east of a hose bib located on the north side of the fuel island shack. No signage was provided for the hose bib.



Photograph 19 – Close-up view of the inside of the Facility oil/water separator. Note the separator appeared to be nearing capacity.

Sign-in Sheet	VDOT MS4 (General Permit No. VAR04) Fredericksburg District Office and Residency Complex VDOT District No. 6	Site Visit Date: 10/23/2012

VDOT

VIRGINIA DEPARTMENT OF TRANSPORTATION
SITE VISIT ATTENDANCE RECORD

Location: Fredericksburg District		
Visit Date: 10/23	Start Time: 9:30	End Time:
Roster Administration Notes:		

	First Name	Last Name	Affiliation (VDOT, EPA, EEE, etc.)	Attendees Signature	Title
1.	Chris	Swanson	EEE		~~EE~~ Consultant
2.	Lee	Hixson	EEE		
3.	Tracey	Harmon	VDOT		
4.	Morris	Walton	VDOT		
5.	David	Wilson	VDOT		HAZMAT MGR
6.	Anthony	D'Angelo	EPA Contractor		Inspector
7.	Pete	Gold	EPA		Inspector
8.	Allison	Gerhardt	EPA		Inspector
9.	Mark	Kuker	EPA Contractor		Inspector
10.	Bart	VanNieuwenhuizen	VDOT		Infrastructure Manager
11.	Marcie	Parker	VDOT		Dist. Maint. Engr.
12.	V.G. Mac	McQueen	VDOT		ACTING DIST. EQUIPT MGR
13.	PAUL ~~DOHERTY~~	DOHERTY	VDOT		DIST FAC MGR
14.	Crystal (Nicky)	Childs	VDOT		Dist fuel Coordinator
15.	Cathy Hartfield	Hartfield	VDOT		Dist Fuel Coordinator Back
16.					
17.					
18.					
19.					
20.					